



Vonda Long-Dillard  
Associate Director  
Federal Relations

AT&T Services, Inc.  
1120 20<sup>th</sup> St. NW, Suite 1000  
Washington, D.C. 20036  
Phone 202 457-2043  
Fax 202 457-3070  
E-Mail: vonda.long@att.com

October 18, 2013

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., SW  
Washington, DC 20554

ACCEPTED/FILED

OCT 18 2013

Federal Communications Commission  
Office of the Secretary

**Re: WC Docket Nos. 10-90, 11-42 - FCC Form 481 – Carrier Annual Reporting Data**  
Collection Form (Sections 54.313 / 54.422 Annual Reporting)

Dear Ms. Dortch:

In compliance with the aforementioned proceeding, AT&T is filing redacted FCC Form 481 reports for the following wireless entities.

STUDY AREA CODE (SAC)	SAC NAME FOR WIRELESS ELIGIBLE TELECOMMUNICATIONS CARRIERS	STATE
619004	NEW CINGULAR WIRELESS PCS, LLC	ALASKA
259908	AT&T MOBILITY, LLC	ALABAMA
409004	NEW CINGULAR WIRELESS PCS, LLC	ARKANSAS
479006	NEW CINGULAR WIRELESS PCS, LLC	IDAHO
269905	NEW CINGULAR WIRELESS PCS, LLC	KENTUCKY
279010	NEW CINGULAR WIRELESS PCS, LLC	LOUISIANA
319026	NEW CINGULAR WIRELESS PCS, LLC	MICHIGAN
289912	NEW CINGULAR WIRELESS PCS, LLC	MISSISSIPPI
389015	NEW CINGULAR WIRELESS PCS, LLC	NO. DAKOTA
539010	AT&T MOBILITY, LLC	OREGON
639005	AT&T MOBILITY PUERTO RICO, INC	PUERTO RICO
399015	AT&T MOBILITY, LLC	SO. DAKOTA
449022	NEW CINGULAR WIRELESS PCS, LLC	TEXAS
199009	AT&T MOBILITY, LLC	VIRGINIA
529910	AT&T MOBILITY, LLC	WASHINGTON
339920	NEW CINGULAR WIRELESS PCS, LLC	WISCONSIN
209012	NEW CINGULAR WIRELESS PCS, LLC	W. VIRGINIA
259005	CORR WIRELESS COMMUNICATIONS, LLC	ALABAMA
229014	GEORGIA RSA #8 PARTNERSHIP	GEORGIA

If you have questions, please contact me at (202) 457 – 2043.

Sincerely,

/s/ Vonda T. Long-Dillard

Attachments

<b>FCC Form 481 - Carrier Annual Reporting</b> <b>Data Collection Form</b>		FCC Form 481 DATE 09-01-2014 DAY 09-01-2014 BY 09-01-2014
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<010> Study Area Code	399015
<015> Study Area Name	AT&T Mobility (Pine Ridge)
<020> Program Year	2014
<030> Contact Name: Person USAC should contact with questions about this data	Vonda T Long-Dillard
<035> Contact Telephone Number: Number of the person identified in data line <030>	(202) 457-2043
<039> Contact Email: Email of the person identified in data line <030>	vl4468@att.com

ANNUAL REPORTING FOR ALL CARRIERS		58-515 Completion Required	58-527 Completion Required
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<100> Service Quality Improvement Reporting	(complete attached worksheet)	(check box when complete)	
		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input type="checkbox"/> -- check box if no outages to report			
<300> Unfulfilled Service Requests (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)	<input type="text" value="0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330> Detail on Attempts (broadband)	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed	<input type="text" value="0"/>		
<420> Mobile	<input type="text" value="0"/>		
<440> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450> Fixed	<input type="text" value="0"/>		
<450> Mobile	<input type="text" value="0"/>		
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510>	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610>	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)?	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000> Voice Services Rate Comparability	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010>	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1100> Terrestrial Backhaul (Y/N)?	(if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

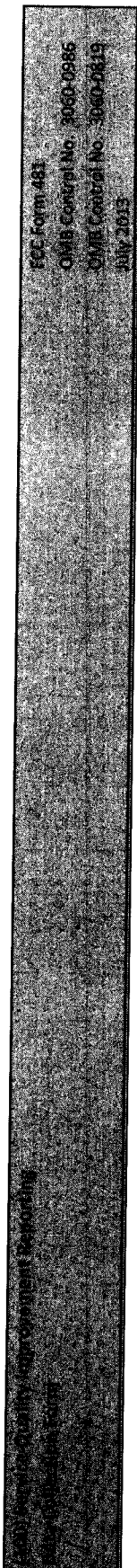
**Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet**

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input checked="" type="checkbox"/>

**Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet**

<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>



<010>	Study Area Code	399015
<015>	Study Area Name	AT&T Mobility (Pine Ridge)
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Vonda T Long-Dillard
<035>	Contact Telephone Number - Number of person identified in data line <030>	(202) 457-2043
<039>	Contact Email Address - Email Address of person identified in data line <030>	vl4468@att.com
<110>	Has your company received its ETC certification from the FCC? If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no ) Yes (yes / no ) Yes

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which receives only frozen support, your progress report is only required to address voice telephony service

Please check these boxes below to confirm that the attached PDF, on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets	✓
<114>	Report how much universal service (USF) support was received	✓
<115>	How (USF) was used to improve service quality	✓
<116>	How (USF) was used to improve service coverage	✓
<117>	How (USF) was used to improve service capacity	✓
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	✓

399015SD112  
Name of Attached Document (.pdf)

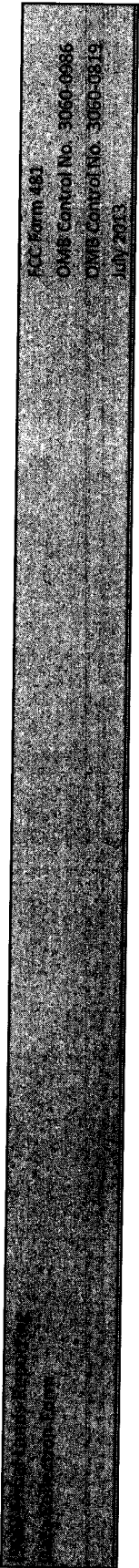
**LINE 200 ATTACHMENT**

**REDACTED – FOR PUBLIC  
DISCLOSURE**

FCC Form 483  
 Date: Current Ver. 3050 0586  
 Date: Revised Ver. 3050 0515  
 Ver. 3050

<010>	Study Area Code	399015			
<015>	Study Area Name	AT&T Mobility (Pine Ridge)			
<020>	Program Year	2014			
<030>	Contact Name - Person USAC should contact regarding this data	Vonda T Long-Dillard			
<035>	Contact Telephone Number - Number of person identified in data line <030>	(202) 457-2043			
<039>	Contact Email Address - Email Address of person identified in data line <030>	v4468@att.com			
<810>	Reporting Carrier	AT&T Mobility LLC			
<811>	Holding Company	SBC Telecom; SBC Long Distance; BellSouth Mobile Data, Inc.			
<812>	Operating Company	AT&T Mobility Corporation			
<813>	Affiliates		SAC	Doing Business As Company or Brand Designation	
	AT&T MOBILITY, LLC		399015	AT&T Mobility	
	NEW CINGULAR WIRELESS PCS, LLC		449022	AT&T Mobility	
	SOUTHWESTERN BELL TELEPHONE COMPANY		445216	AT&T Texas	
	AT&T CORP		549004	AT&T Corp.	
	AT&T MOBILITY, LLC		199009	AT&T Mobility	
	AT&T MOBILITY, LLC		259908	AT&T Mobility	
	AT&T MOBILITY, LLC		529910	AT&T Mobility	
	AT&T MOBILITY, LLC		539010	AT&T Mobility	
	AT&T MOBILITY PUERTO RICO, INC		639005	AT&T Mobility	
	BELLSOUTH TELECOMMUNICATIONS, LLC		215191	AT&T Florida	
	BELLSOUTH TELECOMMUNICATIONS, LLC		225192	AT&T Georgia	
	BELLSOUTH TELECOMMUNICATIONS, LLC		235193	AT&T North Carolina	
	BELLSOUTH TELECOMMUNICATIONS, LLC		245194	AT&T South Carolina	
	BELLSOUTH TELECOMMUNICATIONS, LLC		255181	AT&T Alabama	
	BELLSOUTH TELECOMMUNICATIONS, LLC		265182	AT&T Kentucky	
	BELLSOUTH TELECOMMUNICATIONS, LLC		275183	AT&T Louisiana	
	BELLSOUTH TELECOMMUNICATIONS, LLC		285184	AT&T Mississippi	
	BELLSOUTH TELECOMMUNICATIONS, LLC		295185	AT&T Tennessee	
	ILLINOIS BELL TELEPHONE COMPANY		345070	AT&T Illinois	
	INDIANA BELL TELEPHONE COMPANY, INC		325080	AT&T Indiana	
	MICHIGAN BELL TELEPHONE COMPANY		315090	AT&T Michigan	
	NEVADA BELL TELEPHONE COMPANY		555173	AT&T Nevada	
	NEW CINGULAR WIRELESS PCS, LLC		209012	AT&T Mobility	
	NEW CINGULAR WIRELESS PCS, LLC		269905	AT&T Mobility	
	NEW CINGULAR WIRELESS PCS, LLC		279010	AT&T Mobility	
	NEW CINGULAR WIRELESS PCS, LLC		289912	AT&T Mobility	
	NEW CINGULAR WIRELESS PCS, LLC		319026	AT&T Mobility	

399015SD - 5

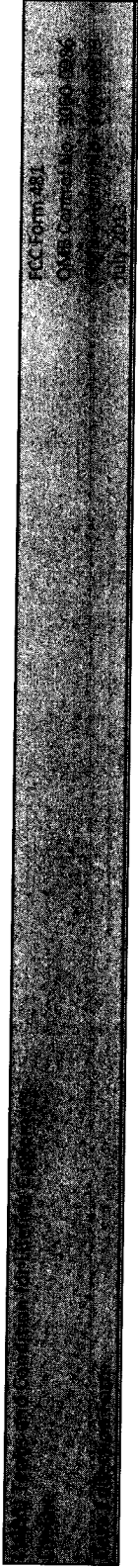


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<035>	Contact Telephone Number - Number of person identified in data line <030>	(202) 457-2043
<039>	Contact Email Address - Email Address of person identified in data line <030>	vl4468@att.com
<910>	Tribal Land(s) on which ETC Serves	Oglala Sioux Tribe
<920>	Tribal Government Engagement Obligation	399015SD920
		Name of Attached Document (.pdf)

If your company serves Tribal lands, please select (Yes, No, NA) for each of these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

Select (Yes, No, NA)	Yes
<921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions;	Yes
<922> Feasibility and sustainability planning;	Yes
<923> Marketing services in a culturally sensitive manner;	Yes
<924> Compliance with Rights of way processes	Yes
<925> Compliance with Land Use permitting requirements	Yes
<926> Compliance with Facilities Siting rules	Yes
<927> Compliance with Environmental Review processes	Yes
<928> Compliance with Cultural Preservation review processes	Yes
<929> Compliance with Tribal Business and Licensing requirements.	Yes





<010>	Study Area Code	399015
<015>	Study Area Name	AT&T Mobility (Pine Ridge)
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Vonda T Long-Dillard
<035>	Contact Telephone Number - Number of person identified in data line <030>	(202) 457-2043
<039>	Contact Email Address - Email Address of person identified in data line <030>	vi4468@att.com

<1210>	Terms & Conditions of Voice Telephony Lifeline Plans	Name of attached document (.pdf)
<1220>	Link to Public Website	HTTP <a href="http://www.wireless.att.com/learn/articles-resources/community-support/lifeline-link-up.jsp">www.wireless.att.com/learn/articles-resources/community-support/lifeline-link-up.jsp</a>

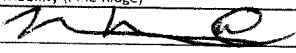
Please check these boxes below to confirm that the attached PDF, on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	<input checked="" type="checkbox"/>
<1222>	Details on the number of minutes provided as part of the plan,	<input checked="" type="checkbox"/>
<1223>	Additional charges for toll calls, and rates for each such plan.	<input checked="" type="checkbox"/>

<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481
	OMB Control No. 3060-0986
	OMB Control No. 3060-0819
	July 2013

<010> Study Area Code	399015
<015> Study Area Name	AT&T Mobility (Pine Ridge)
<020> Program Year	2014
<030> Contact Name - Person USAC should contact regarding this data	Vonda T Long-Dillard
<035> Contact Telephone Number - Number of person identified in data line <030>	(202) 457-2043
<039> Contact Email Address - Email Address of person identified in data line <030>	vl4468@att.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

<p>I certify that I am an officer <small>*(see Title or position of Authorized Officer below)</small> of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.</p>	
<p>Name of Reporting Carrier: AT&amp;T Mobility (Pine Ridge)</p>	
<p>Signature of Authorized Officer: </p>	<p>Date 10/4/13</p>
<p>Printed name of Authorized Officer: Hardmon Williams III</p>	
<p>Title or position of Authorized Officer: * VP &amp; General Manager - Minnesota &amp; Northern Plains, AT&amp;T Mobility Corporation, the manager of AT&amp;T Mobility (Pine Ridge)</p>	
<p>Telephone number of Authorized Officer: (952) 656-9333</p>	
<p>Study Area Code of Reporting Carrier: 399015</p>	<p>Filing Due Date for this form: 10/15/2013</p>
<p>Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.</p>	

# ATTACHMENTS

**LINE 100 ATTACHMENTS**

**REDACTED – FOR PUBLIC  
DISCLOSURE**

# EXHIBIT 399015SD310

## AT&T MOBILITY'S REPORT OF UNFULFILLED REQUESTS FOR SERVICE FOR THE 2012 CALENDAR YEAR

Number of Unfulfilled Requests for Service	Description of How Service Was Attempted
0	<p>Section 54.313(a)(3) of the Commission's rules requires an ETC to report the number of requests for service from potential customers within the ETC's designated service area that were unfulfilled during the past year. The filing must also detail how the ETC attempted to provide service to those potential customers. In response to a request for service, AT&amp;T Mobility takes the following steps:</p> <ol style="list-style-type: none"> <li>1) AT&amp;T Mobility will provide service on a timely basis to requesting customers within AT&amp;T Mobility's service area where AT&amp;T Mobility's network already passes the potential customer's premises;</li> <li>2) If a customer cannot be served by AT&amp;T Mobility's existing facilities, AT&amp;T Mobility will provide service within a reasonable period of time, if service can be provided at reasonable cost by: <ol style="list-style-type: none"> <li>a) Modifying or replacing the requesting customer's equipment;</li> <li>b) Deploying a roof-mounted antenna or other equipment;</li> <li>c) Adjusting the nearest cell tower;</li> <li>d) Adjusting network or customer facilities</li> <li>e) Reselling services from another carrier's facilities to provide service; or</li> <li>f) Employing, leasing or constructing an additional cell site, cell extender, repeater, or other similar equipment.</li> </ol> </li> </ol> <p>If, after these steps, the customer cannot be served, AT&amp;T Mobility will notify the customer and provide the Commission with an annual report of how many requests for service could not be filled. In 2012 AT&amp;T Mobility had 0 unfulfilled service requests in SD-Pine Ridge.</p>

Steve Largent  
President/CEO

August 27, 2012

Mr. Ralph de la Vega  
President and Chief Executive Officer  
AT&T Mobility & Consumer Markets  
AT&T  
1025 Lenox Park Boulevard, Suite B650  
Atlanta, GA 30319

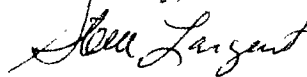
Dear Ralph:

Congratulations! This letter is to notify you that AT&T Mobility has completed the recertification process for the CTIA Business Continuity/Disaster Recovery Program ("Program") for the period July 1, 2012– June 30, 2013. CTIA deems AT&T Mobility is compliant with the principles and objectives of the Program and confirms AT&T Mobility has recertified that it has implemented and maintained the requirements set forth in the Program.

Please ensure that the relevant employees of AT&T Mobility are aware of your recertification status. If you should have any questions concerning the certification process, please contact Michael Altschul, CTIA's Senior Vice President & General Counsel, at (202) 736-3248 or [maltschul@ctia.org](mailto:maltschul@ctia.org).

CTIA commends AT&T Mobility for its ongoing leadership and participation in the CTIA Business Continuity/Disaster Recovery Program, and we look forward to continuing to work with AT&T Mobility on this important industry initiative.

Sincerely,



Steve Largent

cc: Bruce Lundeen  
BCP Standards & Practices  
AT&T Business Continuity Planning



**Steve Largent**  
President/CEO

August 16, 2012

Mr. Ralph de la Vega  
President and CEO  
AT&T Mobility Services, LLC  
1025 Lenox Park Boulevard, B650  
Atlanta, GA 30319

Dear Ralph:

Congratulations! This letter is to notify you that AT&T Mobility ("AT&T") has completed the recertification process for the CTIA Consumer Code for Wireless Service ("Voluntary Consumer Code") for the period January 1, 2012 – December 31, 2012, and is deemed compliant with the principles, disclosures and practices set forth in the Voluntary Consumer Code. Accordingly, AT&T is authorized to use and display the CTIA Seal of Wireless Quality/Consumer Information, subject to the terms and conditions set forth in the attached License Agreement.

Please ensure that the relevant employees of AT&T review the License Agreement before using the Seal. Use of the Seal constitutes acceptance of these terms and conditions. Upon request, we will provide two specimens (color and black/white) of the Seal for AT&T's use on its website or collateral materials. If you should have any questions concerning the recertification process or use of the Seal, please contact Michael Altschul, CTIA's Senior Vice President & General Counsel, at (202) 736-3248 or [maltschul@ctia.org](mailto:maltschul@ctia.org).

CTIA commends AT&T for its ongoing leadership and participation in the CTIA Voluntary Consumer Code, and we look forward to continuing to work with AT&T on this important industry initiative.

Sincerely,

*Congratulations!*



Steve Largent

Attachment

cc: Martin Grambow



## SEAL OF WIRELESS QUALITY/CONSUMER INFORMATION

### LICENSE AGREEMENT

Company is hereby granted a non-exclusive, world-wide, royalty-free license to use CTIA's Seal of Wireless Quality/Consumer Information ("Seal") to represent that Company voluntarily adopts and follows the *CTIA Consumer Code for Wireless Service* and has certified such to CTIA.

CTIA permits the use of appropriate references to CTIA and the Seal solely in connection with the *CTIA Consumer Code for Wireless Service* Program. References to the Seal shall not be misleading as to the extent of Company's voluntary support and participation in the CTIA Voluntary Code for Consumer Information program. The Seal may appear in Company's advertising, promotional material or other literature to indicate its voluntary and consistent application of the *CTIA Consumer Code for Wireless Service*.

Upon CTIA's acknowledgement of Company's certification, CTIA shall supply Company with a specimen of the Seal. Company shall not modify or alter the Seal without prior written permission from CTIA, and such permission shall not be unreasonably withheld. Company agrees to amend or discontinue the use of the Seal upon written request of CTIA. Company shall immediately cease use of the seal upon receipt of CTIA's written notice to do so.

Company assumes full and complete responsibility for its use of the Seal, and agrees that its use of the Seal constitutes a declaration that Company voluntarily adopts and follows the principles set forth in the *CTIA Consumer Code for Wireless Service*.

Use of the Seal for other purposes than those stated in this License Agreement is an unauthorized use of the Seal and is strictly prohibited.

This license may be renewed annually subject to Company's successful completion of the certification process.

Use of the Seal constitutes acceptance of these legal terms and conditions.





## **EXHIBIT 399015SD610**

### **AT&T MOBILITY'S CERTIFICATION REGARDING ITS ABILITY TO FUNCTION IN EMERGENCY SITUATIONS**

Section 54.313(a)(6) of the Commission's Rules requires an ETC to certify an ability to function in emergency situations as set forth in section 54.202(a)(2) of the Commission's Rules. The standards set forth in section 54.202(a)(2) include a reasonable amount of back-up power to ensure functionality without an external power source, an ability to reroute traffic around damaged facilities and a capability to manage traffic spikes resulting from emergency situations. AT&T Mobility has in place emergency operation procedures so that it can function in an emergency. Backup power is provided at switch locations and cell sites through a combination of batteries, portable and permanent generators. AT&T Mobility also has mobile switches and portable COWs (Cells on Wheels) that it can deploy in the event of an emergency. Based on the foregoing, AT&T Mobility certifies it is able to function in emergency situations as set forth in section 54.202(a)(2).

EXHIBIT 399015SD920

Tribal Government Engagement Obligation

Section 54.313(a)(9) of the Commission's rules requires an ETC that receives high-cost support to serve Tribal lands to engage in certain discussions with Tribal governments that includes:

- (i) A needs assessment and deployment planning with a focus on Tribal community anchor institutions;
- (ii) Feasibility and sustainability planning;
- (iii) Marketing services in a culturally sensitive manner;
- (iv) Rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes; and
- (v) Compliance with Tribal business and licensing requirements.

This rule became effective August 5, 2013, leaving high-cost recipients little time to engage in meaningful discussions with Tribal governments prior to the October 15, 2013 due date of FCC Form 481. See 78 Fed. Reg. 47211 (Aug. 5, 2013). Attached please find a copy of correspondence to the relevant Tribal government sent after the effective date of this rule. AT&T personnel followed up with at least one phone call to the relevant Tribal government contact.

Beyond the customary and frequent business as usual contacts that AT&T Mobility has with consumer and business customers residing on and governmental authorities of Tribal lands, AT&T Mobility follows additional processes with respect to facilities on Tribal lands. These processes include voluntarily submitting notifications via the FCC's on-line Tower Construction Notification System (TCNS) system to notify federally recognized Native American Tribes and Alaska Native Villages, and State Historic Preservation Officers (SHPOs) of proposed communications tower constructions. The TCNS also provides a means for Tribal governments and SHPOs to respond directly to AT&T Mobility as to whether they have questions regarding the proposed tower construction.

The elements included in the TCNS report include but are not limited to:

- IDENTIFICATION OF INDIAN TRIBES OR NHOS
- INITIAL CONTACT WITH INDIAN TRIBES AND NHOS
- FOLLOW-UP LETTERS WITH INDIAN TRIBES AND NHOS
- NOTIFICATION OF FINAL CONTACTS
- STATE HISTORIC PRESERVATION OFFICER RESPONSE LETTER

For both its owned sites and for sites where its equipment is co-located, AT&T Mobility also performs the required reviews and filings pursuant to the National Historic Preservation Act, P.L. 102-575, Section 101(d)(2) and Section 106 to the appropriate State and/or Tribal Historic Preservation Officers (SHPO or THPO), as applicable.

In addition, site construction complies with all applicable zoning and permitting laws including but not limited to Rights of Way, Land Use Permits, Facility Siting Rules, Environmental, Cultural Preservation, and Tribal Business and Licensing Requirements.

Finally, AT&T Mobility has a current business license issued by the relevant Tribal government.



EXHIBIT 399015SD920

REDACTED - FOR PUBLIC DISCLOSURE

Dan Youmans  
Regional Vice President  
External Affairs

AT&T Services, Inc.  
16331 NE 72<sup>nd</sup> Way  
RTC1  
Redmond, WA 98052

T: 425-580-1833  
F: 425-580-8652  
daniel.youmans@att.com  
www.att.com


October 3, 2013  
President Bryan V. Brewer  
Oglala Sioux Tribe  
P.O. Box 2070  
Pine Ridge, SD 57770

Dear President Brewer:

AT&T Mobility LLC or one of its affiliates ("AT&T Mobility") has been designated as an eligible telecommunications carrier ("ETC") to serve Tribal members residing on the Pine Ridge Reservation. As an ETC, AT&T Mobility is subject to the rules and requirements of the Federal Communications Commission (FCC), including 47 C.F.R. § 54.313(a)(9), which requires high-cost USF recipients that serve Tribal lands to have discussions with Tribal governments.<sup>1</sup> Although the Commission adopted this rule in November 2011, it did not become effective until August 5, 2013.<sup>2</sup>

You are receiving this letter because in 2012 AT&T Mobility received federal high-cost support and utilized that support on capital improvements in areas governed by your Tribal government. AT&T is available for discussions with you and your colleagues about AT&T's wireless service and the topics set forth in 47 C.F.R. 54.313(a)(9), including construction of new sites on Tribal land and related rights of way and permitting issues.<sup>3</sup> I am available to talk with you at your earliest convenience on these and other issues.

Sincerely,

  
Dan Youmans

<sup>1</sup> See *Connect America Fund*, WC Docket No. 10-90 et al., 26 FCC Rcd 17663 (2011) ("USF/ICC Transformation Order") *pets. for review pending sub nom. In re: FCC 11-161*, No. 11-9900 (10th Cir. filed Dec. 8, 2011); 47 C.F.R. § 54.313(a)(9). See also FCC Office of Native American Programs Public Notice, DA 12-11665 (released July 19, 2012)([http://fjallfoss.fcc.gov/edocs\\_public/attachmatch/DA-12-1165A1.pdf](http://fjallfoss.fcc.gov/edocs_public/attachmatch/DA-12-1165A1.pdf)).

<sup>2</sup> See 78 Fed. Reg. 47211 (Aug. 5, 2013). This rule is the subject of numerous petitions for reconsideration, which, to date, the FCC has neglected to address. See *Petition for Reconsideration of USTelecom*, WC Docket No. 10-90 et al. (filed Dec. 29, 2011); *Rural Incumbent Local Exchange Carriers Serving Tribal Lands Petition for Reconsideration*, WC Docket No. 10-90 et al. (filed Dec. 29, 2011); *Petition for Reconsideration and Clarification of USTelecom*, WC Docket No. 10-90 et al., 4-16 (filed Aug. 20, 2012); *USTelecom's Petition for Reconsideration and Clarification and Comments in Response to Paperwork Reduction Act*, WC Docket No. 10-90 et al. (filed April 4, 2013).

<sup>3</sup> The FCC Tribal engagement rule is set forth in its entirety at 47 C.F.R. § 54.313(a)(9).